

1
2
3
4
5
6
7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 RICHARD KADREY, *et al.*,

13 Individual and Representative
14 Plaintiffs,

15 v.

16 META PLATFORMS, INC., a Delaware
corporation,

17 Defendant.
18

Case No. 3:23-cv-03417-VC

**STIPULATION AND [PROPOSED]
ORDER ENLARGING TIME FOR CASE
MANAGEMENT STATEMENT**

19 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Richard Kadrey, Sarah Silverman,
20 Christopher Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David
21 Henry Hwang, Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and
22 Christopher Farnsworth (collectively, the “Plaintiffs”); and Defendant Meta Platforms, Inc.
23 (“Meta”) (together, the “Parties”), by and through their respective counsel, stipulate to the
24 following:

- 25 1. The Court scheduled a Further Case Management Conference for July 11, 2025, to discuss
26 how to proceed following the Court’s recent summary judgment orders. *See* Dkt. No. 598
27 at 40; Dkt. No. 599.
28

1 2. Pursuant to the Court's scheduling order, the Parties were directed to submit a Joint Case
2 Management Statement by July 7, 2025. Dkt. No. 599.

3 3. The Parties met and conferred on July 3, 2025 regarding Plaintiffs' remaining allegations
4 and how to proceed at this time, and the Parties have exchanged a draft of a Case
5 Management Statement. In light of the Parties' discussions and the intervening July 4th
6 holiday, however, the Parties request a brief enlargement of time to continue conferring
7 prior to the submission of the Case Management Statement and thus stipulate to the
8 following relief:

9 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through
10 Plaintiffs and Meta, as represented by their undersigned counsel and subject to the approval of the
11 Court, that the Parties shall be afforded until July 8, 2025, to file their Joint Case Management
12 Statement.

Dated: July 7, 2025

Respectfully Submitted,

By: /s/ Mark Weinstein

By: /s/ Maxwell V. Pritt

Bobby A. Ghajar
Colette Ani Ghazarian
COOLEY LLP
1333 2nd Street, Suite 400
Santa Monica, CA 90401
Telephone: (310) 883-6400
Facsimile: (310) 883-6500
Email: bghajar@cooley.com
cghazarian@cooley.com

BOIES SCHILLER FLEXNER LLP
David Boies (*pro hac vice*)
333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsfllp.com

Mark R. Weinstein
Matthew Brigham
Elizabeth Lee Stameshkin
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304
Telephone: 650-843-5000
Facsimile: 650-849-7400
Email: mweinstein@cooley.com
Email: mbrigham@cooley.com
Email: lstameshkin@cooley.com

Maxwell V. Pritt (SBN 253155)
Joshua M. Stein (SBN 298856)
Margaux Poueymirou (SBN 356000)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsfllp.com
jstein@bsfllp.com
mpoueymirou@bsfllp.com

Kathleen R. Hartnett
Judd D. Lauter
COOLEY LLP
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2071
Facsimile: (415) 693-2222
Email: khartnett@cooley.com

Jesse Panuccio (*pro hac vice*)
Jay Schuffenhauer (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsfllp.com
jschuffenhauer@bsfllp.com

Angela Dunning
CLEARY GOTTLIEB STEEN &
HAMILTON LLP
1841 Page Mill Road, Suite 250
Palo Alto, CA 94304-1248
Telephone: (650) 815-4131
Email: adunning@cgsh.com

Joshua I. Schiller (SBN 330653)
David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
jischiller@bsfllp.com
dsimons@bsfllp.com

*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

*Attorneys for Defendant
META PLATFORMS, INC.*

PROPOSED ORDER

Pursuant to the stipulation of the Parties, **IT IS SO ORDERED.**

DATED: _____

HON. VINCE CHHABRIA
United States District Judge

ECF ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Meta concurs in the filing of this document.

/s/ Maxwell V. Pritt